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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 MALE PERFORMANCE MEDICAL
PARTNERSHIP, LLC and MEDICAL
9 PARTNERSHIP, LLC,

10 Plaintiffs,

11 v.

12 PHILIP M. HAYS, an individual

13 Defendant.
14

Case No.: 2:18-cv-01734-GMN-GWF

**STIPULATION AND ORDER SETTING
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT**

(First Request)

15 Pursuant to Local Rule IA 6-1(a) and Fed. R. Civ. P. 6(b)(1)(A), Plaintiffs MALE
16 PERFORMANCE MEDICAL PARTNERSHIP, LLC (“MPMP”), and MEDICAL
17 PARTNERSHIP, LLC (“MP”), (collectively “Plaintiffs”) and Defendant PHILIP M. HAYS
18 (“Defendant” or “Hays”), by and through their undersigned counsel, stipulate to a deadline of and
19 including January 7, 2019, for Defendant Hays to file and serve his answer or other response to
20 the Complaint.

21 Good cause for this request exists to provide the undersigned counsel for Defendant time
22 not only to investigate the facts and assess the potential for settlement of this case but also with
23 regard to the following related actions filed in this District:

- 24 • Case No. 2:18-cv-01731-APG-CWH (MPMP and MP v. 79, LLC), and
- 25 • Case No. 2:18-cv-01914-RFB-GWF (Tissue Regeneration
26 Technologies, LLC, and General Patent, LLC (collectively “TRT”) v.
27 MPMP, MP, et. al.).

28 The undersigned counsel for Defendant Phillip M. Hays is also counsel for Defendant 79, LLC

1 in Case No. 2:18-cv-01731-APG-CWF and counsel for Plaintiff TRT in Case No. 2:18-cv-01914-
2 RFB-GWF, opposite the undersigned Plaintiffs' counsel in this action and both of these related
3 cases. Plaintiffs' counsel believes that a conflict of interest may exist in Defendant's counsel in
4 this case representing Defendant in this action and in Case No. 2:18-cv-01914-RFB-GWF (TRT
5 v. MPMP, MP et al). By entering into this stipulation, Plaintiffs shall not waive this objection.

6 The undersigned counsel for the parties in this case are engaging in good faith efforts to
7 assess whether the parties in this action will be able to resolve their dispute through a negotiated
8 settlement. This effort, however, is also impacted by and may require resolution of overlapping
9 legal and factual issues raised in these related actions. Good cause also exists, given the
10 impending Christmas holiday season. As such, the parties have agreed to set the deadline to
11 respond to January 7, 2019, not only for the defendant in this action but for the defendants in the
12 related actions as well.

13 For the forgoing reasons, the parties hereby stipulate to set the deadline for Defendant 79
14 LLC to answer or otherwise respond to January 7, 2019.

15 **IT IS SO AGREED AND STIPULATED:**

16 **WEIDE & MILLER, LTD.**

17 By: /s/ F. Christopher Austin
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25 **IT IS SO ORDERED:**

26 

27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 12-06-2018